

## **Appeal Ref APP/L5810/W/24/3339060**

### **Stag Brewery Mortlake**

#### **Presentation of West London River Group**

##### **Proof of Evidence**

The West London River Group has provided a written proof of evidence to the Inquiry, this has not been given an Inquiry reference number.

I shall not repeat the detail of the West London River Group and the Towpath Group as this is clearly stated in the Proof, save to say that the Groups represent environmental groups and individuals who are concerned with the environment on and close to the River Thames.

We were instrumental in the establishment of the Thames Strategy Kew to Chelsea published in 2002.

**Our objections are clearly set out in our Proof of Evidence but to summarise:**

##### **Context**

The context of the proposed development is with reference to The River Thames, the Towpath and the Conservation Areas which surround the proposals.

I shall deal, summarise and reflect with each as set out in the Proof of Evidence.

**The River is the predominate influence on the proposals presented, with the various Conservation Areas which surround the site.**

The river thus affords the site only 180 degrees of access, a constricting influence.

The site has significant historical interest and many listed buildings and those of townscape merit lie close by, thus respect of and to the setting of these assets should be carefully considered.

In the Proof:

##### **3.2 The River Thames**

3.2 The River and the towpath provides the landscape setting for Mortlake which has a rural feel in this location, not experienced further east, downstream in more urban settings. Mr Walder made significant reference to the views of the surrounding area, from Chiswick Bridge, from the towpath and from Dukes Meadows. See slide 6 on page 6 of the proof.

3.3.2 The flood risk has been identified in other evidence more fully than we provide. We are a nominated party to the Review of the Thames Strategy which is considering the flood risk strategies of and for each riparian borough between Richmond and the North Sea. This review is funded by the Department of the Environment with the borough of

Richmond leading. This is the first co-ordinated review of flood risk that has been undertaken, in direct response to the change in environmental conditions experienced in recent years and expected in the future.

### **3.3 The Thames Path.**

The Thames path which forms part of the National Trail and is known here as “ the wooded towpath” has a variety of trees affording shade in summer and which provide a most pleasant aspect for and of the river from both banks, north and south. The species of trees are shown on the “Wooded Towpath” document compiled by the Borough of Richmond. Views of the towpath can be seen on slides 1,2,3 now on the screen. In addition the MBCG has provided a most helpful series of views under Core Document CDL 45.

This stretch of the path provides a most attractive vista east from the Maltings downstream and west from Bulls Alley to Chiswick Bridge. The path is heavily used by all types of users when uses may conflict and may occur as walkers, cyclists which sometimes go at high speed, electric delivery bikes and those with dogs frequently without leads, to say nothing of the elderly, have equal rights to use the path.

The additional users, residents and businesses in the proposed scheme will impose further pressure on the footpath, not really ameliorated by the plaza level walkway which would offer a different more urban feel to the journey. As this plaza level is above the towpath and is expected to have food and beverage uses at plaza level the noise and busy ness will be very different to walking on a “wooded towpath”. Access to the “wooded towpath” is by means of two stairways one with a ramp which will encroach onto the towpath at towpath level, thus reducing the width.

### **4.0 Tall buildings**

This has been extensively covered in other evidence. We believe that the proposals are too tall especially on the northern (towpath) elevation in contradiction to the Planning Brief, which expects buildings to taper down towards the towpath. The density is also considered too high, imposing unnecessary strain on the infrastructure which will serve the scheme if permitted. The proposals are not “in context” with the suburban nature of the surrounding predominately residential uses. The design is not innovative in concept. If a very different design was adopted reflecting less traditional criteria although different to the surrounding area this would add, in our view, significantly to the acceptance of any scheme.

The heights of buildings overlooking the towpath will overshadow the path and will cause the path to be over dominated by eight storey structures.

The Maltings building will be subjugated by the scale of the new structures close by and will loose the “landmark” nature which it has currently.

Any wildlife including bats that remain will suffer from the urbanisation of the area.

## **5. Daylight, Sunlight, overshadowing and light pollution.**

I have commented about overshadowing previously. The overshadowing will affect the river itself as well as the towpath. I would like to add that the towpath at night provides an **unlit** section of the path which would encourage the continuity of wildlife. Slide 5.

## **6. Traffic.**

This has been covered extensively in other evidence. As our proof shows we are concerned with the additional traffic that a scheme of this size will impose on the surrounding infrastructure. The on site basement car parking will inevitably cause additional traffic and deliveries to those commercial users of the site will need access to the semi-pedestrianised ground level. It should be noted that many schemes consented in recent years have been “car free” and we can only presume that this is not the case here because of the lack of public transport being categorised as PTAL 2/3.

## **7. Air Quality.**

This has also been covered extensively in other evidence. Our concern is that any additional traffic may cause harm to pedestrians and cyclists.

7.3 Increased “green screen” along the road facing areas of the site will help mitigate pollution.

## **8. Ecology and Biodiversity.**

I quote from the emerging New Local Plan;

**“Biodiversity, including the wider ecological and green infrastructure networks play a crucial role in adapting to the effects of climate change. Biodiversity enhances and enriches the borough’s landscapes and wildlife and makes a significant contribution to the distinctiveness of this unique borough, providing a sense of place, cultural heritage, tranquillity as well as opportunities for recreation and a healthier lifestyle. In addition, protecting and enhancing biodiversity including the provision of new habitats and features, increases the resilience of our ecosystems and helps the physical environment to change and adapt to different stresses”**

It goes on to say that all new developments should utilise opportunities to attract new species to a site. This can include nest boxes to provide nesting and roosting opportunities for birds...and where appropriate bats.

**Further, Darkness is also important to wildlife and species that are nocturnal and adapted and/or dependant on dark environments are particularly sensitive to light pollution from adjacent developments”.**

**“Developments should achieve biodiversity net gain, wherever feasible and appropriate. Opportunities to enhance habitats and create new should be maximised”.**

There have been many changes in National, London and local policies over the last 8-10 years in respect to biodiversity, SuDS, flooding and sustainability all of which directly impact the development. This is very much our concern around aspects of the development. In the latest Richmond draft local plan stated above that biodiversity and wider green infrastructure networks and what it entails for new developments is identified in greater detail.

There does not appear to be much biodiversity in the proposals. The planting of many trees is welcome but most of these will be in constricted soil areas 1mX1mx1.2m in depth. This gives little opportunity for maturity of the trees. The loss of part of the OOLTI is regretted and the repositioning in areas of the built site should, in our view, NOT be counted as added “greening”.

### **9. Drainage SuDS and Surface Water.**

The aim of SuDs is to alleviate problems by:

Storing or reusing surface water at source

Decreasing flow rates to watercourses

Improving water quality

In the design presentation and shown on plans Mr Levinson confirmed that hard surfaces on site would either be porous or permeable. This is welcome, however surface water will drain north from the central roadway and either discharge via drains to the river or into attenuation tanks. This water must have interceptor traps to ensure that no pollutants discharge into the river. The balance of the surface water is discharged south into the existing combined sewer system which under DEFRA publication “Storm Overflows Discharge Reduction Plan” September 2023 will remove the automatic right of new developments to add surface water to the combined sewer network.

Sewerage spilling is occurring more frequently with increased rainfall, the current operator Thames Water has amply demonstrated that it is incapable of dealing with the existing problems, let alone new increased capacity.

There appears to be little provision of green roofs to allow evapotranspiration.

### **10. Spoil and Waste.**

Removal and delivery. This has been covered in previous evidence and the removal of spoil and the delivery of materials to the site will be covered in either Conditions or through the Section 106 Agreement. Cost should not be the major reason for not employing the river for such purposes, the environmental impact of whatever system is adopted should be carefully considered.

## **Conclusions.**

As our Statement of Common Ground shows, we are not adverse to the mixed redevelopment of the site for the proposed uses with the exception of the allocation of the school site which need is questioned.

However, we do not believe that the proposals adequately reflect the “setting” dominated by the river with views up and downstream. The Historic significance of Mortlake and the Conservation Areas, listed buildings and those with townscape merit is not sufficiently and sympathetically dealt with in the design of the proposals.

The massing, height and overbearing nature of the 8 storey buildings on the northern part of the site overlooking the towpath do not follow the planning brief to “step down” towards the northern and southern edges of the site.

The Environment Act 2021 which includes Biodiversity net gain should, we believe, be applicable, this Act came into force in February 2024. As the Inspector has confirmed emerging legislation and by default that already on the Statute book will be taken into account. The Local Planning Authority have applied a 20% net gain in biodiversity in the Draft Local Plan which should be taken into account as an emerging policy. We do not believe that the proposals provide the required net gain.

The Maltings should be recognised as an important contributor to the setting of the Conservation Area. The proximity of the proposed new buildings restrict the importance of this part of the site as a “landmark” structure.

Any development should be able to clearly demonstrate that the proposals will complement the Conservation Areas, provide a built environment that will be able to withstand the vagaries of changing climatic conditions, accord with published and accepted planning policy and provide a proposal which has taken into account the changing circumstances of population growth and decline in requirements for an element such as the school, and accord with National, regional and local policies.

Thank you.